

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: :
Thomas E. Stumpf and Stacy R. :
Stumpf, : Case No. 15-70662-JAD
Debtors :
: Chapter 13
Ronda J. Winnecour, :
Chapter 13 Trustee, :
Movant : Related to Docs. No. 101 & 104
v. : Document No.
Legacy Mortgage Asset Trust 2020- :
GS5. :
Respondent :

Response of Debtors to Trustee's Notice of Final Cure Payment

Now come the Debtors and file this response to the Trustee's Notice of Final Cure Payments

1. After some email exchanges with the attorney for the Respondent, it appears that there is no dispute that the Trustee has cured the mortgage arrearage.

2. The dispute between the Movant and Respondent appears to center on whether the Debtors are behind in the mortgage payments after the Chapter 13 Plan ended, and the Debtors began direct payments.

3. The Debtors believe that the accounting of the Respondent leaves much to be desired; the year end mortgage interest report-

Federal Form 1098 for 2020-seems to contain an error. The form reports an "outstanding mortgage principal" of \$67,502.32 (which, according to the official instructions, is the balance as of January 1, 2020 or the acquisition date of the mortgage), and a "remaining balance" of \$78,925.70 at the end of the year. This seeming discrepancy is suggesting that the mortgage balance *increased* during 2020 by more than 10% despite the payments made by the Trustee, and direct payments by the Debtors.

For these reasons, the Debtors concur with the Trustee's Notice of Final Cure.

Respectfully submitted,

/s/Michael N. Vaporis
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